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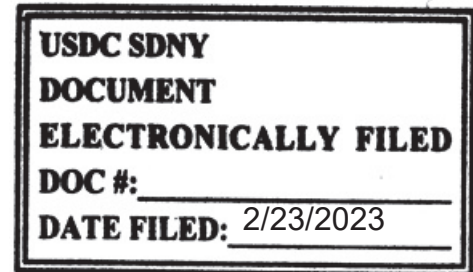
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February 22, 2023

VIA ECF

Hon. Robert W. Lehrburger
United States Magistrate Judge
Southern District of New York
500 Pearl Street, Courtroom 18D
New York, NY 10007-1312



Re: Fagnani v. Ubiquiti Inc., Civil Action No.: 1:22-cv-10138-PGG-RWL

Dear Judge Lehrburger:

This firm represents Defendant Ubiquiti Inc. ("Defendant") in the above-referenced action. We write to respectfully request a second extension of time for Defendant to respond to the Complaint, up to and including March 27, 2023.

By way of background, Plaintiff commenced this action on November 29, 2022. (ECF No. 1.) According to the affidavit of service, Defendant was purportedly served with the Summons and Complaint on December 23, 2022 by way of the New York Secretary of State, making Defendant's responsive pleading due on January 12, 2023. On January 25, 2023, Defendant, with Plaintiff's consent, submitted a request for an extension of Defendant's responsive pleading deadline up to and including February 24, 2023. (ECF No. 9) The Court granted Defendant's request that same day. (ECF No. 10) As a result, Defendant's responsive pleading deadline is currently February 24, 2023.

Defendant respectfully requests that the deadline for Defendant to move, answer, or otherwise respond to the Complaint be extended for 30 days through March 27, 2023 so as to allow the parties an opportunity to explore a potential non-litigated resolution of this matter. Plaintiff's counsel has consented to this extension, and the requested relief will not affect any other scheduled dates.

This application is being made in good faith and not to cause undue delay. We thank the Court for its time and attention to this matter, and for its consideration of this application.



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Respectfully submitted,

SEYFARTH SHAW LLP

/s/ John W. Egan

John W. Egan

cc: All counsel of record (via ECF)

Granted.

SO ORDERED:

2/23/2023

A handwritten signature in black ink, appearing to be 'R. Lehrburger', written over a horizontal line.

HON. ROBERT W. LEHRBURGER
UNITED STATES MAGISTRATE JUDGE